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To: WaterTreatmentPlantGPComments@ecy.wa.gov; James.Maroncelli@ecy.wa.gov
Cc: [Lidgard, Michael](#)
Subject: U.S. EPA Comments, Water Treatment Plant GP, NPDES Permit No. WTPGP-2014
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Attachments: [image001.png](#)
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[image003.png](#)



**UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY
REGION 10**

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OFFICE OF
WATER AND
WATERSHEDS

James M. Maroncelli
Department of Ecology
P.O. Box 47696
Olympia, WA 98504-7696

(via email to: WaterTreatmentPlantGPComments@ecy.wa.gov)

Dear Mr. Maroncelli:

The U.S. Environmental Protection Agency reviewed the above-referenced draft permit pursuant to the NPDES Memorandum of Agreement between the Washington Department of Ecology and United States Environmental Protection Agency Region 10 (MOA) and the EPA's obligation to oversee implementation of the NPDES programs by delegated states. The EPA reviewed the draft permit for consistency with the Clean Water Act and NPDES implementing regulations and with the Department of Ecology's (Ecology) regulations and permit writing guidance.

The EPA completed a screening-level review of the above-mentioned draft NPDES permit and provides following comments.

Ecology states in the fact sheet (Page 36) that mixing zones will be authorized; however, the permit neglects to explicitly authorize mixing zones in the general permit. Mixing zones are needed for pH since the allowable effluent limitations of 6.0 to 9.0 may cause or contribute to excursions above the water quality standards for pH in some receiving waters. The EPA recommends that the permit explicitly authorize the mixing zones as described in the fact sheet.

Ecology concludes in the fact sheet (Page 15) that there is no reasonable potential for the discharge of trihalomethanes to violate water standards. Ecology alludes to the availability of data to support the conclusion in the fact sheet, but no data is provided and no reasonable potential analysis (based on worst case assumptions for example) is presented. The EPA suggests that Ecology support this conclusion with data, if available.

Please to contact me if you have any questions. Sincerely, Karen

KAREN BURGESS, P.E.

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